

## **Deficiency Progress Report – Update 3**

Report Submitted: June 17, 2010

**CUPA: Humboldt County Division of Environmental Health**

**Evaluation Date: June 9 and 10, 2009**

### **Evaluation Team:**

Kareem Taylor, Cal/EPA  
Asha Arora, DTSC  
Patrick Lee, DTSC  
Jack Harrah, OES  
Terry Snyder, SWRCB

**Corrected Deficiencies: 1, 2, 4, 5**

**Next Progress Report (Update 4) Due: September 27, 2010**

**Please update the deficiencies below that remain outstanding.**

- 1. Corrected Deficiency:** The CUPA did not correctly report information on its Annual Summary Reports.
  - The Annual Single Fee Summary Report (Report 2) for fiscal year (FY) 2007/2008 shows that the CUPA's total Permit by Rule (PBR) is 1 and Conditional Exemption (CE) is 4. Annual Inspection Summary Report (Report 3) shows that CUPA's total Onsite Hazardous Waste Treatment (PBR, CA, CE) is 4. Upon discussion with the Director, it was discovered that the CUPA's total regulated Onsite Hazardous Waste Treatment may be 1.
  - Report 2 for FY 2006/2007 shows that the CUPA's total Permit by Rule (PBR) is 1 and Conditional Exemption (CE) is 2. Report 3 shows that CUPA's total Onsite Hazardous Waste Treatment (PBR, CA, CE) is 2. Upon discussion with the Director, it was discovered that the CUPA's total regulated Onsite Hazardous Waste Treatment may be 1.
  - In the Report 3 for FY 2006/2007, the CUPA reported only 5 CalARP routine inspections when 7 CalARP audits were performed. The CUPA's audits usually include routine compliance inspections.
  - Report 3 for FY 2007/2008 does not contain the percent of routine inspections with Class 1 or Class 2 violations that returned to compliance (RTC) within 90 days. In addition, Report 3 shows that the CUPA's total RCRA large quantity

generators (LQGs) are 4. Upon discussion with the Director, it was discovered that the CUPA's total RCRA LQGs may be 2.

- In the Annual Enforcement Summary Report (Report 4) for FY 2007/2008, the CUPA only reported 1 administrative enforcement order (AEO) for 3 program elements, but internal records showed that the CUPA issued 14 AEOs. In addition, Report 4 does not contain the correct number of informal enforcement actions and penalty amounts.

**Preliminary Corrective Actions:** By September 10, 2009, the CUPA will submit its revised FY 2006/2007 and 2007/2008 Summary Reports that contain the correct information.

Please submit copies of the corrected Summary Reports along with the first progress report.

**CUPA's 1<sup>st</sup> Update (9-8-09):** Revised reports are included as Attachment I. Corrections were made to the 06/07 and 07/08 Report 2 Onsite Treatment numbers; 07/08 Report 3 Generators (all) inspection summary numbers (the RTC for Generators (all) is not available from our database and is so noted); 07/08 Report 4 number of informal actions, violation counts by type, and number and amounts of AEOs.

The number of AEOs issued in 2007/2008 was two, as reported: one in the Hazardous Waste Generator program (Carter Properties) and one that included fines for Aboveground Storage Tanks, Hazardous Waste Generator, Business Plan, and Underground Storage Tanks (Lucas Hall). The confusion arose when column one on the attached spreadsheet entitled "Combined Humboldt County AEOs – All Years" was used as a reference for determining when AEOs were issued. Column one refers to the year that the violations were found and the enforcement review process was initiated. The year the AEO was issued and settled is shown on the spreadsheet my color/Fiscal Year in the Site Name column in bold. This was the source of the penalty information on the corrected Report 4. Note: Total settlements are reported on the spreadsheet. The total penalties collected in each AEO are proportionately split into programs based on the number of violations cited in each program in the AEO.

**Cal/EPA's 1<sup>st</sup> Response:** There are still some problems on the FY 07/08 Annual Enforcement Summary Report. The report does not contain the total number of formal enforcement actions initiated in FY 07/08. Instead, it reports the number of formal enforcement actions that were settled in FY 07/08. For example, the AEO totals document sent shows that 14 AEOs were initiated in FY 07/08, but only 1 settled AEO was reported in the 4 program element rows in which the violations were found. Also, the columns for local AEOs (authority granted by local ordinance), AEOs (authority granted by the Health and Safety

Code), and AEOs issued within 240 days (for the hazardous waste program) are mutually exclusive. A H&SC AEO cannot also be reported in the local AEO column. The AEO may be reported in the "AEOs issued within 240 days" column in the HWG row if the criteria was met.

By November 10, 2009, please amend the CUPA's FY 07/08 and 08/09 Annual Enforcement Summary Reports. Email the reports to Cal/EPA, attention: Kareem Taylor.

**Cal/EPA's 2<sup>nd</sup> Response:** The CUPA resubmitted the Summary Reports with all the required corrections. Cal/EPA and DTSC consider this deficiency corrected.

2. **Corrected Deficiency:** The CUPA has not inspected every stationary source subject to the CalARP program within the past three years. From the last three summary reports, the CUPA inspected 9 stationary sources in FY 2005/2006, 5 in FY 2006/2007, and 1 in FY 2007/2008, for a total of 15 inspections. At the time the FY 2007/2008 summary report was submitted, there were 21 stationary sources.

**Preliminary Corrective Actions:** By June 10, 2010, the CUPA will inspect at least one-third of its stationary sources.

Along with the second progress report, the CUPA will submit an action plan to ensure that all stationary sources will be inspected every three years.

**CUPA's 1<sup>st</sup> Update (9-8-09):** The following CalARP facilities were inspected since the audit:

- 1) Loleta CSD
- 2) City of Arcata Sewage Treatment Plant / Corp Yard
- 3) City of Arcata Alliance Transfer Station
- 4) Humboldt Bay Municipal Water District Essex Operation Center
- 5) McKinleyville Community Services District Wastewater Treatment Plant

The following CalARP facilities are scheduled for inspection this quarter:

- 6) Garberville WWTP- Due by 10/13/2009
- 7) PALCO-Due by 10/10/2009
- 8) Resort Improvement WWTP and WTP- Due by 10/12/2009
- 9) City of Eureka WWTP and WTP-Due by 10/6/2009.

This will total nine inspections in the first half of FY 09/10, meeting the requirement of the audit.

**Cal/EPA's 1<sup>st</sup> Response:** Cal/EPA and Cal EMA consider this deficiency corrected.

3. **Deficiency:** The CUPA has not yet obtained business plans from all businesses subject to the business plan program. Specifically, agricultural handlers, at this time, are neither regulated under the business plan program, nor properly exempted from the provisions of this program.

**Preliminary Corrective Actions:** After many setbacks, the Humboldt County Department of Agriculture has received business plan questionnaire feedback from about half of the ag handlers polled. By June 10, 2010 the CUPA, in conjunction with the Ag Department, will submit an action plan to either regulate ag handlers under HSC Chapter 6.95, Article 1, or to individually exempt them under one of the provisions of HSC section 25503.5.

**CUPA's 1<sup>st</sup> Update (9-8-09):** The Humboldt County Department of Agriculture has identified the facilities in its program and implemented inspections with one inspector who has been trained in the Hazardous Waste Generator and Business Plan programs. Aboveground storage tank inspection training is scheduled for October 2009. A questionnaire was sent to all known growers in the county in early 2009, with the following results:

Questionnaires sent = 347

Businesses confirming that they met CUPA program thresholds = 19

Businesses indicating that they did not meet CUPA program thresholds = 134

"Returned to Sender" responses = 22

"Out of Business" responses = 6

All responses = 182

Inspection activities:

Inspections Completed = 11

Requested Business Plans = 11

Plans Received = 9

Violations = 0

Inspection Types

Business Plan Inspection = 11

HazWaste Generator Inspection = 0

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to Cal EMA's Response.

- **Cal EMA's Response:** The CUPA is making inroads into the agricultural population. Please report your progress with the next quarterly update.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** No additional inspections have been made since the last progress report. The Ag inspector has attended APSA training and will attend the CUPA Conference for additional training. The CUPA is currently communicating with the Agriculture Department to reconfirm their commitment to complete inspections of the agricultural community's facilities.

**Cal/EPA's 2<sup>nd</sup> Response:** On the next progress report, please report the total number of agricultural facilities that should be regulated under the business plan program and the number of business plans received from these facilities.

- **Cal EMA's Response:** Please report your progress with the next quarterly report.

**CUPA's 3<sup>rd</sup> Update (6-22-10):**

The Ag Commissioner's inspector completed APSA training in October, 2009. The previous and current inspection and enforcement totals are reported below.

<b>Ag Business Totals</b>	<b>Previous Report</b>	<b>Current Report</b>
Questionnaires sent	347	347
Confirmed Thresholds	19	73
Exempt Businesses	134	167
No Response to Questionnaire		123
Returned to Sender	22	22
Out of Business	6	19
All Responses	182	202

<b>Inspection Activities</b>		
Inspections Completed	11	35
Requested Business Plans	11	20
Plans Received	9	18
Violations	0	12

<b>Inspection Types</b>		
Business Plan Inspections	11	18
HazWaste Generator	0	0

**Cal/EPA's 3<sup>rd</sup> Response:** Please refer to Cal EMA's Response.

- **Cal EMA's Response:** Please report your progress with the next quarterly report.

**CUPA's 4<sup>th</sup> Update:** Enter Update Here

4. **Deficiency:** The CUPA's 2008 area plan did not contain the pesticide drift elements required by Senate Bill 391 (2004). Additionally, the area plan did not contain a reporting form similar to the model form shown in Title 19, section 2720.

**Preliminary Corrective Actions:** By September 10, 2009, the CUPA will append a reporting form to the area plan and supply a copy of the form with the first quarterly update. By June 10, 2010 the CUPA will ensure that the area plan includes all of the required information from 19CCR 2722-2728, including pesticide drift elements.

**CUPA's 1<sup>st</sup> Update (9-8-09):** The reporting form from Title 19, Section 2720 is attached and has been incorporated into the 2008 Area Plan. Also attached is the document entitled, "Summary of Revisions to Humboldt County 2008 Area Plan as required by June 2009 CUPA Audit". The required form (below) was added to the Area Plan.

## CHECKLIST FOR AREA PLAN ELEMENTS

### Reference Section

#### Section 2722-Emergency Response Procedures

Approach, Recognition & Evaluation  
Personnel Monitoring & Decontamination  
Equipment Monitoring & Decontamination

#### Section 2723-Pre-emergency Planning

Pre-incident site surveys  
Planning & Coordination  
Emergency Funding Access  
Disposal Facility Access  
Emergency Response Contractor Access  
Integrated Response Management System

#### Section 2724- Notification & Coordination

Notification & Coordination  
Emergency Communications  
Responsibility Matrix  
OES Notification

#### Section 2725-Training

Emergency Response Personnel Training  
Training Documentation

Training Exercises

#### Section 2726-Public Safety & Information

Site Perimeter Security  
Safety Procedure Information  
Information Release Responsibility  
Medical Notification  
Evacuation Plans

#### Section 2727-Supplies and Equipment

Listing & Description  
Testing & Maintenance

#### Section 2728-Incident Critique and Follow-up

Critique and follow-up

### Reference to Humboldt County Hazardous Materials Area Plan

Part II, pg. 4-12  
Part II, pg. 12-17, Part (I)  
Part II, pg. 24

Part I, pg. 39, Part A, B and C  
Part I, pg. 4-41  
Part II, pg. 26-36  
Part II, pg. 16  
Part II, pg. 26-36  
Part I, pg. 1, pg. 30-37, Part L

Part II, pg. 1 & 2, Part L  
Part E  
Part I, pg. 7-30  
Part II, pg. 4-17

Part II, pg. 4-17, Part F & H  
Each Agency maintains it's own training  
documentation  
Part I, pg. 40

Part II, pg. 5, 10-12  
Part II, pg. 10-12  
Part I, pg. 11-13, part II, pg. 10  
Part K  
Part II, pg. 10-12

Part B, D  
Individual agencies responsible for  
maintenance and testing.

Part I, pg. 40

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to Cal EMA's Response.

- **Cal EMA's Response:** The reporting form supplied is satisfactory. That part of the deficiency has been corrected. Please forward the pesticide drift language when it becomes available, and the remainder of the deficiency will be reevaluated at that time.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** No additional progress to report at this time. CUPA will provide the pesticide drift language when it is completed in consultation with Humboldt County's Agriculture Department, a stakeholder in this issue.

**Cal/EPA's 2<sup>nd</sup> Response:** Along with the next progress report, please forward the pesticide drift language to Cal/EPA for review.

- **Cal EMA's Response:** Please report your progress with the next quarterly report.

**CUPA's 3<sup>rd</sup> Update (6-22-10):** The area plan now includes all of the required information from 19CCR 2722-2728, including pesticide drift elements. (Attachment 1.) The updated area plan is also attached. (Attachment 2.)

**Cal/EPA's 3<sup>rd</sup> Response:** Cal/EPA and Cal EMA consider this deficiency corrected.

5. **Corrected Deficiency:** The CUPA has not prepared an annual CalARP performance audit.

**Preliminary Corrective Actions:** By December 10, 2009, the CUPA will carry out a performance audit, and include a copy of this audit with the second quarterly update. Subsequently, at the CUPA's option, the elements of 19CCR 2780.5 can be appended to the annual Title 27 self audit.

**CUPA's 1<sup>st</sup> Update (9-8-09):** Not started – will be completed by December 10, 2009.

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to Cal EMA's Response.

- **Cal EMA's Response:** Please forward a copy of the performance audit when it becomes available.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** The performance audit has been completed and is attached.

**Cal/EPA's 2<sup>nd</sup> Response:** Cal/EPA and Cal EMA consider this deficiency corrected.

6. **Deficiency:** The CUPA's Underground Storage tank (UST) facility files reviewed did not contain current Unified Program facility, tank, and monitoring application forms.

**Preliminary Corrective Actions:** By June 30, 2010, all UST facility files will be updated with the new Forms A (Facility Information), B (Tank Information), and D



(Monitoring) which contain new fields of information from the old forms. This can be done during the annual compliance inspection by leaving the new forms with the owner/operator for completion or the CUPA can pre-populate owner/operator information into the form functional Word documents and leave copies with the facility. The new forms were part of the new Title 27 regulations adopted last year.

Another alternative is to use Envision Connect (when in operation) or CERS (currently under development) portals. UST owner/operator may enter facility information via the web portal which will be able to be captured automatically by the Envision database.

**CUPA's 1<sup>st</sup> Update (9-8-09):** We are distributing the required forms at each annual inspection. The information from the forms will be entered into Envision Connect and online access via CERS will be available after data conversion and implementation are complete. Envision Connect implementation is under way and we are expecting to go live in October 2009.

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to SWRCB's Response.

- **SWRCB's Response:** The SWRCB appreciates the effort the CUPA is making to correct this deficiency. Please provide an update on the CUPA's UST forms implementation in Envision Connect in the next progress report.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** We continue to collect the forms from UST facilities. We are in the data conversion phase of implementing Envision Connect and will begin data entry post conversion.

**Cal/EPA's 2<sup>nd</sup> Response:** Along with the next progress report, please report approximately how many UST facilities have updated their forms in FY 09/10. Please refer to SWRCB's Response.

- **SWRCB's Response:** The SWRCB appreciates the effort the CUPA is making to correct this deficiency. Please provide an update on the CUPA's UST forms implementation in Envision Connect in the next progress report.

**CUPA's 3<sup>rd</sup> Update (6-22-10):** Envision Connect was implemented in late April 2010. We have input 54 percent of 75 UST facilities and 214 USTs at those 75 facilities. By the next update due date we will have 100 percent of UST data entered in Envision Connect.

**Cal/EPA's 3<sup>rd</sup> Response:** Along with the next progress report, please report approximately how many UST facilities have updated their forms in FY 09/10. Please refer to SWRCB's Response.

- **SWRCB's Response:** The SWRCB appreciates the effort the CUPA is making to correct this deficiency. Please provide an update on the CUPA's UST forms implementation in Envision Connect in the next progress report.

**CUPA's 4<sup>th</sup> Update:** [Enter Update Here](#)

7. **Deficiency:** The CUPA's permit does not include all the required UST specific elements. It is missing monitoring requirements of both tanks and piping or an attached approved monitoring plan.

**Preliminary Corrective Actions:** By August 10, 2009, the CUPA will issue permits with monitoring requirements or attach an approved monitoring plan. The CUPA can develop a template containing the monitoring options and indicate what each facility has or the monitoring requirements may be shown on the permit as: Monitoring or programming for monitoring will be conducted at the locations of the following equipment, if installed: monitoring system control panels; sensors monitoring tank annular spaces, sumps, dispenser pans, spill containers, or other secondary containment areas (e.g. double-walled piping); mechanical or electronic line leak detectors; and in-tank liquid level probes (if used for leak detection). Also monitoring options for automatic pump shutdown, fail safe operation, or other programming options will be specified.

Additionally, if the CUPA wants to list equipment test due dates and other pertinent information they may do so.

**CUPA's 1<sup>st</sup> Update (9-8-09):** We are currently assuring that operators have completed current Forms A, B, Response, and Monitoring Plan at each inspection. The forms will be entered in to Envision Connect and future permits will have the required information printed on the permit.

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to SWRCB's Response.

- **SWRCB's Response:** The SWRCB appreciates the effort the CUPA is making to correct this deficiency. Please provide an update on the CUPA's UST forms implementation in Envision Connect in the next progress report. SWRCB will consider this deficiency corrected if, in the next update, the CUPA demonstrates that its UST permits contain the UST specific elements.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** We are currently working on permit design as part of the data conversion. We will have the new permit and submit a copy with the next update.

**Cal/EPA's 2<sup>nd</sup> Response:** Along with the next progress report, please submit to Cal/EPA a copy the CUPA's permit that contains all of the UST specific elements. Please refer to SWRCB's Response.

- **SWRCB's Response:** The SWRCB appreciates the effort the CUPA is making to correct this deficiency. Please provide an update on the CUPA's UST forms implementation in Enviro Connect in the next progress report. SWRCB will consider this deficiency corrected if, in the next update, the CUPA demonstrates that its UST permits contain the UST specific elements.

**CUPA's 3<sup>rd</sup> Update (6-22-10):** We are working on completion of our UST and consolidated permits. Some modifications to the standard permit that comes with Enviro Connect is still required. The permits should be complete and ready for submission with our next quarterly update.

**Cal/EPA's 3<sup>rd</sup> Response:** Along with the next progress report, please submit to Cal/EPA a copy the CUPA's permit that contains all of the UST specific elements. Please refer to SWRCB's Response.

- **SWRCB's Response:** The SWRCB appreciates the effort the CUPA is making to correct this deficiency. Please provide an update on the CUPA's UST forms implementation in Enviro Connect in the next progress report.

**CUPA's 4<sup>th</sup> Update:** Enter Update Here

8. **Deficiency:** In some cases, the CUPA is not following-up and/or documenting RTC for businesses cited for violations in Notices to Comply and inspection reports/Notices of Violation. Out of 12 files reviewed by DTSC, 4 files did not contain evidence of RTC or CUPA follow-up documentation. Below are some businesses that were cited for violations, but documentation of RTC or CUPA follow-up was not found:

- Magee Auto Shop – inspected 8-8-07
- Eureka Smog & Repair – inspected 4-4-08
- Cal Redwood Acquisition -- inspected 6-12-06
- Ronald C. Ruchong DDS – inspected 5-30-07

Documenting facility RTC and CUPA follow-up actions is required as part of the CUPA's implementation of its Inspection and Enforcement (I and E) plan. In addition, this information is required for the CUPA's Annual Summary Reports.

**Preliminary Corrective Actions:** By September 10, 2009, the CUPA will follow-up with businesses cited for violations and document RTC actions. In the absence of RTC documentation from businesses, the CUPA will document follow-up actions like reinspections, enforcement letters, etc.

On the first progress report, the CUPA will submit to Cal/EPA an action plan as to how it will follow-up with businesses with violations on a more consistent basis.

**CUPA's 1<sup>st</sup> Update (9-8-09):** Envision Connect automates the inspection and reinspection process by identifying all open violations. Inspectors will have their home screens set up so that uncorrected violations appear on their "to-do" list when the required correction date has arrived. If the follow-up indicates that the correction has not been made, an NOV will be issued with possible formal enforcement, if needed. Administrative staff will follow up on minor violations with businesses and enter RTC into Envision Connect.

**Cal/EPA's 1<sup>st</sup> Response:** Along with the next progress report, please submit a sample screen shot of the "to-do" list an inspector would see on their home page.

**CUPA's 2<sup>nd</sup> Update:** The CUPA Supervisor has conducted a training session with all CUPA staff in reviewing the proper use of the Return To Compliance (RTC) documentation. New procedures are being developed to achieve tighter adherence to RTC documenting requirements. Additionally, the CUPA is in the process of adopting a new database system. Currently we are working on data conversion and expect to "go live" within the next 60 days. We will provide a screenshot of the "to do" list with the next update.

**Cal/EPA's 2<sup>nd</sup> Response:** Along with the next progress report, please submit to Cal/EPA a sample screen shot of the "to-do" list an inspector would see on their home page. In addition, please submit copies of recent (within 6 months) inspection reports and RTC documentation from 3 facilities cited for violations.

**CUPA's 3<sup>rd</sup> Update (6-22-10):**

Violations cited by Jon Verbeck are shown below as an example of the violation tracking screen. Those listed without dates in the "Complied on Date" column are still open. Those violations with entries in the "Complied on Date" column have been corrected and are RTC. Currently, the utility for printing inspection reports from the database is not functioning, so paper inspection records are included below for reference.

Deficiency Progress Report  
January 14, 2010  
Page 13 of 30

EnvisionConnect  
File Tools Help  
Thursday, June 17, 2010

Back Forward Home Refresh

### Search for a scheduled violation inspection

To select a scheduled inspection, search for a scheduled violation inspection below then click a record in the list. If a scheduled inspection is not found, click [Perform a Complaint Investigation Inspection](#) or [Perform a Service Request Inspection](#).

Enter your search value here:  in (All Fields)

Matches: 140

View: All Employees' Inspections and All Dates and All Scheduled Violation Inspections, Sorted by Comply By Date (Increasing)

Employee	Serial Nu...	Facility ID	Name	Site Address	Violati...	Program/Element	Comply By D...	Complied On Date
JON VERBECK	DA0017519	FA0003591	Wallan, Ken	1070 Bear Butt...	GT08	(none)		
JON VERBECK	DA0001819	FA0000394	Brians 76 & Auto Repair	609 Wildwood ...	GT08	(none)		
JON VERBECK	DA0019066	FA0001809	L & M Renner Inc	2435 Newburg ...	BP02	Business Plan (HM...	6/26/2010	
JON VERBECK	DA0019105	FA0001385	HCDPW	100 County Ya...	GT08	Haz Waste Gener...	6/27/2010	6/14/2010
JON VERBECK	DA0019108	FA0001396	HCDPW	37581 Mattole ...	BP08	Business Plan (HM...	6/27/2010	
JON VERBECK	DA0019121	FA0003352	Three Rivers Logging Co	29565 Highway...	BP08	Business Plan (HM...	7/2/2010	
JON VERBECK	DA0019122	FA0003352	Three Rivers Logging Co	29565 Highway...	GT11	Haz Waste Gener...	7/2/2010	
JON VERBECK	DA0019056	FA0001815	L & M Renner Inc	76 Bear Canyo...	UT47	UST General	7/9/2010	6/9/2010
JON VERBECK	DA0019056	FA0001815	L & M Renner Inc	76 Bear Canyo...	UT52	UST General	7/9/2010	6/9/2010
JON VERBECK	DA0019106	FA0001385	HCDPW	100 County Ya...	AT01	AST General	7/10/2010	
JON VERBECK	DA0019109	FA0001396	HCDPW	37581 Mattole ...	AT01	AST General	7/15/2010	
JON VERBECK	DA0019049	FA0001807	L & M Renner Inc	176 Dinsmore ...	AT63	AST General	11/30/2010	
JON VERBECK	DA0019049	FA0001807	L & M Renner Inc	176 Dinsmore ...	AT76	AST General	11/30/2010	
JON VERBECK	DA0019049	FA0001807	L & M Renner Inc	176 Dinsmore ...	AT34	AST General	11/30/2010	
JON VERBECK	DA0019055	FA0001815	L & M Renner Inc	76 Bear Canyo...	AT63	AST General	11/30/2010	
JON VERBECK	DA0019055	FA0001815	L & M Renner Inc	76 Bear Canyo...	AT76	AST General	11/30/2010	
JON VERBECK	DA0019055	FA0001815	L & M Renner Inc	76 Bear Canyo...	AT65	AST General	11/30/2010	

X [Employee] = 'JON VERBECK' Edit Filter

Workflow: Perform an Inspection

Start Humboldt2009Evaluation... EnvisionConnect

Connected

11:53 AM

HUMBOLDT COUNTY DIVISION OF ENVIRONMENTAL HEALTH  
CERTIFIED UNIFIED PROGRAM AGENCY  
INSPECTION REPORT

PAGE 2 OF 2

DATE 5/27/10

FILE # 1023

FACILITY NAME: HCDPW Garberville

FACILITY ADDRESS: 100 County Road Road

CORRECTIVE ACTIONS: \_\_\_\_\_

107- Waste oil has exceeded the 270 day accumulation storage time limit. Have the oil disposed of at a licensed hazardous waste disposal facility by a licensed hazardous waste hauler within 30 days. Send a copy of the disposal manifest to DEH within the 30 day timeframe (Repeat violation)

201- This facility meets the criteria for a spill prevention control and countermeasure plan regulated under the Abandoned Petroleum Storage Act. Submit an APSA within 45 days. Create an SPCC for the facility within 45 days and contact our office for a document review and inspection of APSA compliance. This is a repeat violation and may be subject to administrative civil or criminal enforcement.



IF CHECKED, MAKE THE ABOVE LISTED CORRECTIONS, COMPLETE THE RETURN TO COMPLIANCE FORM AND RETURN IT TO DEH BY THE CORRECTION SUBMITTAL DATE GIVEN ON PAGE 1

Received By:

Inspected By:

Marty Messinger  
Facility Representative

Don Johnson  
Hazardous Materials Specialist





# Humboldt County Department of Health and Human Services DIVISION OF ENVIRONMENTAL HEALTH

100 H Street - Suite 100 - Eureka, CA 95501  
Voice: 707-445-6215 - Fax: 707-441-5699 - Toll Free: 800-963-9241  
envhealth@co.humboldt.ca.us

## INSPECTION REPORT: Common CUPA Violations

Page 1 of 2

INSPECTION TYPE ☐ New ☐ Routine ☐ Follow-up ☐ Service Request ☐ Exemption Verification ☐ Closure Verification

File # 1005 EPA ID # CA4922765400 Inspection Date 5/27/2010 Time In 11:50 Time Out 11:30

Facility Name HCDP Co. Garberville Phone 707-445-7421

Facility Address 100 County Road 2000

Consent Given By Steve Paul Title Owner

AUTHORITY: This inspection is conducted under authority of Chapter 6.95, §25508, Chapter 6.5 §25185(a) and §25185.5 of the California Health and Safety Code. Under §25188 of the Health and Safety Code any person subject to a compliance schedule who does not comply to that schedule is subject to civil penalties. Under §25189(a) of the Health and Safety Code, any person who intentionally or negligently makes any false statement or representation in any report, record, or other document, filed, maintained, or used for purposes of compliance with Chapter 6.5 of the California Health and Safety Code, shall be liable for civil penalties which are not to exceed \$25,000 per violation per day that violation(s) continue.

- |  |   |
|--|---|
| <input type="checkbox"/> 101. Failed to make a hazardous waste determination.  | <input type="checkbox"/> 119. Transported hazardous waste without or with incomplete manifest.  |
| <input type="checkbox"/> 102. No EPA ID Number.  | <input type="checkbox"/> 121. Failed to retain manifests for 3 years.   |
| <input type="checkbox"/> 103. Unauthorized waste storage.  | <input type="checkbox"/> 124. Failed to keep manifests/bills of lading for spent acid batteries for 3 years.  |
| <input type="checkbox"/> 104.1 Failed to prevent hazardous waste release.<br>Location: _____   | <input type="checkbox"/> 125. Failed to retain copies of non-RCRA hazardous waste receipts for 3 years.   |
| <input type="checkbox"/> 104.2 Disposal or induced disposal of hazardous waste at unauthorized facility.   | <input type="checkbox"/> 126. Failed to retain bills of lading for used oil filters for 3 years.  |
| <input type="checkbox"/> 106. Mislabelled/no labels on hazardous waste containers.   | <input type="checkbox"/> 127. Failed to determine if waste is restricted from land disposal.  |
| <input type="checkbox"/> 106.1 Failed to clearly mark each hazardous waste container with the accumulation start date.   | <input type="checkbox"/> 136. Personnel failed to complete training course.   |
| <input type="checkbox"/> 107. Hazardous waste accumulation storage time limit exceeded.  | <input type="checkbox"/> 141. Unauthorized treatment of hazardous waste.  |
| <input type="checkbox"/> 108. Containers not in good condition/leaking.  | <input checked="" type="checkbox"/> 201. Aboveground storage tank in operation with no SPCC plan.   |
| <input type="checkbox"/> 110. Failed to close hazardous waste containers.  | <input type="checkbox"/> 401. Failed to establish/implement a business plan.  |
| <input type="checkbox"/> 111. Failed to conduct weekly inspection of hazardous waste containers.   | <input type="checkbox"/> 401.1 Failed to update business plan data with administering agency within 30 days of change.  |
| <input type="checkbox"/> 112. Failed to locate ignitable/reactive waste 15 meters from property line.  | <input type="checkbox"/> 401.2 Business Activities Page of Business Plan is missing/deficient.  |
| <input type="checkbox"/> 112.3 Failed to separate incompatible hazardous wastes.   | <input type="checkbox"/> 401.3 Business owner/operator ID page of Business Plan is missing/deficient.   |
| <input type="checkbox"/> 113. Failed to determine leaking or unfit tank.   | <input type="checkbox"/> 402. Hazardous materials inventory is missing or does not meet the information requirements of HSC §25509.   |
| <input type="checkbox"/> 114. Failed to provide secondary containment.   | <input type="checkbox"/> 402.7 The name and phone number of the business representative able to assist emergency personnel in the event of an emergency involving the business during nonbusiness hours is missing/deficient. |
| <input type="checkbox"/> 115. Failed to conduct daily tank inspections.  | <input type="checkbox"/> 403. Emergency Response Plan does not contain the required elements.   |
| <input type="checkbox"/> 116.5 Disposal of used oil by discharge to sewer, drainage systems, surface or groundwaters; by incineration or burning as a fuel or by deposit on land. Unauthorized use of waste oil as dust suppressant. | <input type="checkbox"/> 404. New and annual refresher personnel training program does not meet the requirements of HSC §25504(c).  |
| <input type="checkbox"/> 116.7 Contaminated used oil with other hazardous waste.   | <input type="checkbox"/> 405. Failed to report a release/threatened release.  |
| <input type="checkbox"/> 117. Mismanagement of lead acid batteries including labeling of damaged batteries.  | <input type="checkbox"/> 406. Site map is not attached or deficient.  |
| <input type="checkbox"/> 118. Mismanagement of used oil filters.   | <input type="checkbox"/> 407. Failed to submit a completed inventory form on an annual basis.   |

☐ NO VIOLATIONS OBSERVED

☒ NOTICE OF VIOLATION / SCHEDULE FOR CORRECTION

Corrections must be submitted by 6/17/2010

I, the undersigned facility representative, certify that I have disclosed the location of all hazardous materials or hazardous waste located on the facility identified above and I have made all storage locations available for inspection by the undersigned inspector.

<u>Charlie Hume</u>	<u>5-27-2010</u>	<u>Don Decker</u>	<u>5/27/2010</u>
Facility Representative / Title	Date	Inspector	Date

HUMBOLDT COUNTY DIVISION OF ENVIRONMENTAL HEALTH  
CERTIFIED UNIFIED PROGRAM AGENCY  
INSPECTION REPORT

PAGE 2 OF 2  
DATE 5/27/10  
FILE # 1023

FACILITY NAME: HCDPW Geboville  
FACILITY ADDRESS: 100 County Road Road  
CORRECTIVE ACTIONS: \_\_\_\_\_

107 - Waste oil has exceeded the 270 day accumulation storage time limit. Have the oil disposed of at a licensed hazardous waste disposal facility by a licensed hazardous waste hauler within 30 days. Send a copy of the disposal manifest to DEH within the 30 day timeframe (Repeat violation)

201 - This facility meets the criteria for a spill prevention control and countermeasure plan regulated under the Abandoned Petroleum Storage Act. Submit an APSA within 45 days. Create an SPCC for the facility within 45 days and contact our office for a document review and inspection of APSA compliance. This is a repeat violation and may be subject to abatement or civil or criminal enforcement.



IF CHECKED, MAKE THE ABOVE LISTED CORRECTIONS, COMPLETE THE RETURN TO COMPLIANCE FORM AND RETURN IT TO DEH BY THE CORRECTION SUBMITTAL DATE GIVEN ON PAGE 1

Received By:

Inspected By:

Marty Messinger  
Facility Representative

Don Johnson  
Hazardous Materials Specialist





**Humboldt County Department of Health and Human Services  
DIVISION OF ENVIRONMENTAL HEALTH**

100 H Street - Suite 100 - Eureka, CA 95501  
Voice: 707-445-6215 - Fax: 707-441-5699 - Toll Free: 800-963-9241  
envhealth@co.humboldt.ca.us

**INSPECTION REPORT: Common CUPA Violations**

Page 1 of 2

INSPECTION TYPE ☐ New ☐ Routine ☐ Follow-up ☐ Service Request ☐ Exemption Verification ☐ Closure Verification

File # 1005 EPA ID # CA4000000500 Inspection Date 5/27/2010 Time In 11:50 Time Out 11:30

Facility Name HCDPW Geacerville Phone 707-445-7421

Facility Address 100 County Yard Road

Consent Given By Steve Park Title 7th. Supervisor

AUTHORITY: This inspection is conducted under authority of Chapter 6.95, §25508, Chapter 6.5 §25185(a) and §25185.5 of the California Health and Safety Code. Under §25188 of the Health and Safety Code any person subject to a compliance schedule who does not comply to that schedule is subject to civil penalties. Under §25189(a) of the Health and Safety Code, any person who intentionally or negligently makes any false statement or representation in any report, record, or other document, filed, maintained, or used for purposes of compliance with Chapter 6.5 of the California Health and Safety Code, shall be liable for civil penalties which are not to exceed \$25,000 per violation per day that violation(s) continue.

- |  |   |
|--|---|
| <input type="checkbox"/> 101. Failed to make a hazardous waste determination.  | <input type="checkbox"/> 119. Transported hazardous waste without or with incomplete manifest.  |
| <input type="checkbox"/> 102. No EPA ID Number.  | <input type="checkbox"/> 121. Failed to retain manifests for 3 years.   |
| <input type="checkbox"/> 103. Unauthorized waste storage.  | <input type="checkbox"/> 124. Failed to keep manifests/bills of lading for spent acid batteries for 3 years.  |
| <input type="checkbox"/> 104.1 Failed to prevent hazardous waste release.<br>Location: _____   | <input type="checkbox"/> 125. Failed to retain copies of non-RCRA hazardous waste receipts for 3 years.   |
| <input type="checkbox"/> 104.2 Disposal or induced disposal of hazardous waste at unauthorized facility.   | <input type="checkbox"/> 126. Failed to retain bills of lading for used oil filters for 3 years.  |
| <input type="checkbox"/> 106. Mislabelled/no labels on hazardous waste containers.   | <input type="checkbox"/> 127. Failed to determine if waste is restricted from land disposal.  |
| <input type="checkbox"/> 106.1 Failed to clearly mark each hazardous waste container with the accumulation start date.   | <input type="checkbox"/> 136. Personnel failed to complete training course.   |
| <input type="checkbox"/> 107. Hazardous waste accumulation storage time limit exceeded.  | <input type="checkbox"/> 141. Unauthorized treatment of hazardous waste.  |
| <input type="checkbox"/> 108. Containers not in good condition/leaking.  | <input checked="" type="checkbox"/> 201. Aboveground storage tank in operation with no SPCC plan.   |
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| <input type="checkbox"/> 112. Failed to locate ignitable/reactive waste 15 meters from property line.  | <input type="checkbox"/> 401.2 Business Activities Page of Business Plan is missing/deficient.  |
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| <input type="checkbox"/> 115. Failed to conduct daily tank inspections.  | <input type="checkbox"/> 403. Emergency Response Plan does not contain the required elements.   |
| <input type="checkbox"/> 116.5 Disposal of used oil by discharge to sewer, drainage systems, surface or groundwaters; by incineration or burning as a fuel or by deposit on land. Unauthorized use of waste oil as dust suppressant. | <input type="checkbox"/> 404. New and annual refresher personnel training program does not meet the requirements of HSC §25504(c).  |
| <input type="checkbox"/> 116.7 Contaminated used oil with other hazardous waste.   | <input type="checkbox"/> 405. Failed to report a release/threatened release.  |
| <input type="checkbox"/> 117. Mismanagement of lead acid batteries including labeling of damaged batteries.  | <input type="checkbox"/> 406. Site map is not attached or deficient.  |
| <input type="checkbox"/> 118. Mismanagement of used oil filters.   | <input type="checkbox"/> 407. Failed to submit a completed inventory form on an annual basis.   |

☐ NO VIOLATIONS OBSERVED

☒ NOTICE OF VIOLATION / SCHEDULE FOR CORRECTION

Corrections must be submitted by 6/17/2010

I, the undersigned facility representative, certify that I have disclosed the location of all hazardous materials or hazardous waste located on the facility identified above and I have made all storage locations available for inspection by the undersigned inspector.

Shirley Hough 5-27-2010 Don Decker 5/27/2010  
Facility Representative / Title Date Inspector Date

**Cal/EPA's 3<sup>rd</sup> Response:** The documents reviewed by Cal/EPA only contained one facility's (HCDPW) routine inspection report and "complied on date", but no follow-up or RTC documentation (re-inspection reports, enforcement letters, facility compliance letter, etc.). The violation inspection schedule also showed a

“complied on date” for another facility (L & M Renner, Inc.), but the attached documentation did not include a routine inspection report, any other follow-up or RTC documentation for the facility. Information for a third facility was not included. With that said, Cal/EPA believes that the automated violation inspection schedule tracker is a good tool for timely follow-up actions.

Along with the next progress report, please submit copies of recent (within 6 months) routine inspection reports and RTC documentation (re-inspection reports, enforcement letters, facility compliance letter, etc.) from 3 facilities cited for violations. The CUPA may also include an inspector’s violation inspection schedule as before.

- **DTSC’s Response:** Thank you so much for submitting a sample screen shot of the “to-do” list an inspector would see on their home page. This response did not include copies of recent (within 6 months) inspection reports and RTC documentation from 3 facilities cited for violations as listed in Cal/EPA’s 2<sup>nd</sup> Response (see above). The CUPA included two (2) duplicate inspection reports for the same facility (HDCWD in Garberville).

The HDCPW’s inspection report did not have sufficient documentation to determine the number of containers and how long (how many days, months, or years over the regulatory limit) the container(s) have been stored. Exceeding the hazardous waste accumulation storage limit is considered a non-minor violation. DTSC recommends that the CUPA shorten the timeframe for correction of repeat non-minor violations such as this. Instead of giving the facility 30 days to comply, give the facility 10 days.

Along with the documents requested by Cal/EPA, please submit a copy of HDCWD’s bill of lading or hazardous waste manifest to demonstrate that the facility has returned to compliance.

**CUPA’s 4<sup>th</sup> Update:** [Enter Update Here](#)

9. **Deficiency:** The CUPA did not demonstrate that its staff had been adequately trained in the identification of hazardous waste violations for the small quantity generators (SQGs)/ conditionally exempt small quantity generators (CESQGs); permanent household hazardous waste facilities (PHHWCFs) and temporary household hazardous waste facilities (THHWCFs). Below are some businesses that were incorrectly cited:

- Dazey’s Supply, Inc. – is an SQG facility that was inspected on 12-15-05. The violations cited were for LQG facilities.

- Humboldt Waste Management Authority – inspected on 12-9-08 used a PHHWCFs checklist for conducting a THHWCF inspection.
- Humboldt Waste Management Authority – inspected on 12-9-08 cited violations for tank assessment and annual renewal notification and no PHHWCF checklist was used.

**Preliminary Corrective Actions:** By December 10, 2009, the CUPA will provide hazardous waste generator and HHWCFs training to staff regarding the identification and citation of hazardous waste violations.

On the first progress report, the CUPA will submit to Cal/EPA action plan or schedule for the types and dates of training.

**CUPA's 1<sup>st</sup> Update (9-8-09):** SQG Inspector Training was completed by all inspectors on August 10, 2009.

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to DTSC's Response.

- **DTSC's Response:** DTSC appreciates the CUPA's efforts to correct this deficiency. On the second progress report, the CUPA will submit to Cal/EPA action plan or schedule for the types and dates of hazardous waste generator (LQG) and HHWCFs trainings to staff regarding the identification and citation of hazardous waste violations.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** Most of the Humboldt County CUPA staff will attend the Small and Large Quantity Generator trainings offered at the 2010 CUPA Conference. The staff not attending the conference will be, in turn, trained by the attendees in both SQG and LQG subject areas. The CUPA will provide documentation of the above-described training in the next quarterly report.

**Cal/EPA's 2<sup>nd</sup> Response:** Please refer to DTSC's Response.

- **DTSC's Response:** DTSC appreciates the CUPA's efforts to correct this deficiency. On the next progress report, the CUPA will provide documentation of the training classes staff attended at the 2010 CUPA Conference. It is DTSC's understanding that hazardous waste generator (LQG) and HHWCFs trainings were not offered during the 2010 CUPA Conference. In addition, on the next progress report, the CUPA will submit to Cal/EPA an action plan or schedule for the types and dates of training that have not been completed.



**CUPA's 3<sup>rd</sup> Update (6-22-10):** Maje Hoyos completed LQG training at the 2010 CUPA Conference and subsequently trained staff on February 23, 2010. (Attachment 3.) The CUPA staff have completed all training called for in the 2008 audit, but recognize the importance of ongoing training and professional growth. The requested action plan for further training has not been completed, but will be provided by the next update.

**Cal/EPA's 3<sup>rd</sup> Response:** Please refer to DTSC's Response.

- **DTSC's Response:** The CUPA's response states that Maje Hoyos completed LQG training at the 2010 CUPA Conference and subsequently trained staff on February 23, 2010 (Attachment 3). As DTSC stated earlier in the response to 2<sup>nd</sup> updates that it is DTSC understands that HHWCFs training was not offered during the 2010 CUPA Conference.

In addition, on the next progress report, the CUPA will submit to Cal/EPA an action plan or schedule for the types and dates of training that have not been completed.

**CUPA's 4<sup>th</sup> Update:** [Enter Update Here](#)

**10. Deficiency:** The CUPA did not conduct a complete oversight inspection on 6/11/09. During the oversight inspection of California Redwood Acquisition Company, 1165 Maple Creek Road, Korb, the CUPA inspector missed the following SQG hazardous waste violations:

- Failure to mark 18 empty containers with date emptied,
- Failure to check emergency equipment, such as fire extinguishers and eyewash/showers,
- Failure to maintain aisle space,
- Failure to properly label two (2) used oil tanks, and
- Unauthorized storage of spent antifreeze in a tank with the initial date of accumulation of 12/30/07.

**Preliminary Corrective Actions:** By December 10, 2009, the CUPA will provide hazardous waste generator training to staff regarding the identification and citation of hazardous waste violations.

On the first progress report, the CUPA will submit to Cal/EPA an action plan or schedule for the types and dates of training.

**CUPA's 1<sup>st</sup> Update (9-8-09):** SQG Inspector Training was completed by all inspectors on August 10, 2009.

**Cal/EPA's 1<sup>st</sup> Response:** Please refer to DTSC's Response.

- **DTSC's Response:** DTSC appreciates the CUPA's efforts to correct this deficiency. See DTSC response to the deficiency # 9.

**CUPA's 2<sup>nd</sup> Update (1-14-10):** Most of the Humboldt County CUPA staff will attend the Small and Large Quantity Generator trainings offered at the 2010 CUPA Conference. The staff not attending the conference will be, in turn, trained by the attendees in both SQG and LQG subject areas. The CUPA will provide documentation of the above-described training in the next quarterly report.

**Cal/EPA's 2<sup>nd</sup> Response:** Please refer to DTSC's Response.

- **DTSC's Response:** DTSC appreciates the CUPA's efforts to correct this deficiency. See DTSC response to the deficiency # 9.

**CUPA's 3<sup>rd</sup> Update:** See response to deficiency #9.

**Cal/EPA's 3<sup>rd</sup> Response:** Please refer to DTSC's Response.

- **DTSC's Response:** See response to deficiency #9. On the next progress report, please provide documentation that the staff conducting the oversight inspection also attended these trainings.

**CUPA's 4<sup>th</sup> Update:** Enter Update Here

## **ATTACHMENT 1**

## **Summary of Revisions to Humboldt County 2008 Area Plan as required by June 2009 CUPA Audit**

### **Protocol #1**

CCR Title 19, Section 2722

The Administering Agency (AA) in consultation with the local California Agricultural Commissioner (CAC) and the Local Health Officer (LHO), with assistance from the Department of Pesticide Regulation (DPR), shall establish a procedure to provide immediate access to pesticide specific information to assist emergency response and emergency medical services personnel in identifying all pesticides which may have caused one or more individuals to come into contact with a pesticide as the result of a pesticide drift emergency. This procedure has been incorporated into the Area Plan in Section I, Local Government Responsibilities.

The local California Agricultural Commissioner (CAC) designee will compile a booklet that includes the most common and toxic pesticides used, material safety data sheets for each chemical, and a Humboldt County map with the location of large storage facilities. Once the booklet has been prepared, it will be updated by the CAC on an annual basis or whenever a major change in pesticide quantity or type occurs. A copy of the booklet will be given to Humboldt County Division of Environmental Health, Eureka Fire Department Regional Hazardous Materials Response Team.

If the pesticide drift incident occurs during normal working hours, CAC staff will respond once notified of the incident. The CAC does not have designated on-call staff available to respond to after-hours incidents. Therefore, it's imperative that as soon as it can reasonably be determined that either a pesticide or an agricultural substance may be involved, Sheriffs Office Dispatch should be notified to have a representative of the CAC office respond. It is anticipated that the Ag Commissioner's response may be delayed by up to two hours due to the current after-hours policy.

### **Protocol #2**

CCR Title 19, Section 2722

The AA in consultation with the local CAC and LHO shall incorporate into the Area Plan a procedure to identify specific agency responsibilities when responding to pesticide drift emergencies.

Each section under Local Government has been updated to add specific responsibilities.

**FIRE AGENCIES-** Contact Sheriffs Office (SO) dispatch to contact CAC personnel once a pesticide drift incident has been identified.

**CAC-** Responsibilities addressed above.

**LOCAL HEALTH OFFICER-** Responsible for disseminating information to medical providers regarding eligibility for reimbursement of costs associated with treating victims of a pesticide drift incident. "Reimbursing Medical Costs of Persons Injured in Pesticide Incidents" pamphlet has been added to the Notification tab of the Area Plan.

Has the authority to declare a "health emergency", LHO should be an integral part of decision making process once a pesticide drift incident has occurred.

**SOCIAL SERVICES BRANCH-** The Humboldt County Department of Health and Human Services, Social Services Branch, is responsible for coordinating the activation of shelters and mass care facilities. When notified by IC of a situation where residents must evacuate an area, Social Services will contact the local American Red Cross, open up shelters and hand over responsibility of management to the Red Cross for the duration of shelter occupancy.

**HCDEH-** Responsible for disseminating information to medical providers regarding eligibility for reimbursement of costs associated with treating victims of a pesticide drift incident. "Reimbursing Medical Costs of Persons Injured in Pesticide Incidents" pamphlet is under the Notification tab of the Area Plan.

**PUBLIC HEALTH -** Responsible for the management of the Chempack project. Chempack containers hold nerve agent antidotes to be used in the case of a bio-terrorism or pesticide drift incident.

The AA, in consultation with the CAC, shall incorporate into the Area Plan a procedure to notify residents of a pesticide drift emergency and a procedure to assist in the coordination of an evacuation.

This has been added to pg. II-10 under #4

Reverse 9-1-1 for Humboldt County is a notification toll available through County OES. With the automated reverse 9-1-1 call back system, a user can select a given geographic area and the system will automatically dial the phone numbers within that area. The pre-recorded message is customized with specific instructions and can play in English or Spanish. The message is used to notify area residents of evacuation, shelter-in-place requirements or as a notification to residents of their ability to access health care in the case of a neighborhood exposure to a pesticide drift.



**Protocol #3**

CCR Title 19, Section 2722

The AA shall establish emergency shelter procedures and designate in the Area Plan facilities that can be used for emergency shelter, in the event evacuation is needed.

Has been added to pg. II-10 as #5

The Humboldt County Department of Health and Human Services, Social Services Branch (SSB), is responsible for coordinating the activation of shelters and mass care facilities. When notified by the IC of a situation when residents must evacuate an area, SSB will work with the local American Red Cross to open and manage occupancy of the shelters. Humboldt County Fairgrounds and all public school facilities may be used as emergency shelter in the case of an emergency evacuation.

**Protocol #4**

CCR Title 19, Section 2722

The AA shall incorporate into the Area Plan a procedure to identify all languages known to be spoken in the AA's county or city, as the case may be, and ensure that any individual is able to access services in their native language as required by Section 11135 of the Government Code. The AA shall develop a protocol within the Area Plan that outlines how these services will be provided in the languages identified.

Has been added to page II-1, Emergency Operations

The 2000 census data identifies English, Spanish and Asian speaking populations for Humboldt County. At this time, the AT & T translation service is the only communication service for languages other than English. This service is available to 9-1-1 dispatch centers throughout California. This will not be a reliable service in rural portions of the county.

**Protocol #5**

CCR Title 19, 2722

The AA in consultation with the LHO shall incorporate into the Area Plan a procedure to ensure access to health care within 24 hours of an exposure resulting from a pesticide drift emergency and up to a week after the incident.

No change at this time, refer to pg. II-10

Emergency Alert System (EAS) and reverse 9-1-1 can be activated for large scale notification/information to the public. No other notification tools at this time.

**Protocol #6**

CCR Title 19, Section 2722

The AA in consultation with the LHO shall incorporate into the Area Plan a procedure to inform medical providers regarding eligibility for reimbursement pursuant to Section 12997.5 of the Food and Agriculture Code.

The pamphlet has been attached to Notifications section of Area Plan. This responsibility will also be referenced on page I-38 subsection B under Cost Recovery. Procedure will be referenced in Organization and Responsibilities Section to handout that is already available. Dissemination of information will be responsibility of CAC and LHO.

## ATTACHMENT 2



## **ATTACHMENT 3**

